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13 *Attorneys for Plaintiffs*

14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 SAN JOSE DIVISION

17 IN RE SEAGATE TECHNOLOGY LLC  
LITIGATION

18  
19 CONSOLIDATED ACTION  
20  
21  
22  
23

No. 5:16-cv-00523-RMW

**DECLARATION OF STEVE W.  
BERMAN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
APPOINTMENT AS INTERIM CO-  
LEAD CLASS COUNSEL**

Hearing Date: June 17, 2016  
Hearing Time: 9:00 a.m.

1 I, Steve W. Berman, hereby declare the following:

2 1. My name is Steve W. Berman. I am the managing partner of Hagens Berman Sobol  
3 Shapiro LLP and one of the counsel of record for Plaintiffs Christopher Nelson, Dennis Crawford,  
4 Joshua Enders, Adam Ginsberg, David Schechner, Chadwick Hauff, James Hagey, Nikolas Manak,  
5 John Smith, and Dudley Lane Dortch IV in this litigation. I have been actively involved in this  
6 litigation and have personal knowledge of the matters set forth in this declaration. I could and would  
7 testify truthfully and accurately to the following.

8 2. After filing the Nelson and Ginsberg actions, Plaintiffs become aware that a lawsuit  
9 involving similar subject matter is pending in California Superior Court, *Pozar v. Seagate*  
10 *Technology LLC*, No. CGC-15-547787.

11 3. Since filing the Consolidated Amended Complaint, many consumers in states across  
12 the country have inundated Hagens Berman attorneys with stories similar to those alleged in the  
13 Consolidated Amended Complaint. We maintain a database with consumer information, which  
14 continues to grow steadily.

15 4. Attached hereto as Exhibit A is a true and correct copy of the firm resume and  
16 attorney biographies for Hagens Berman Sobol Shapiro LLP.

17 5. Attached here Attached hereto as Exhibit B is a true and correct copy of the firm  
18 resume and attorney biographies for Axler Goldich LLC.

19  
20 I declare under penalty of perjury under the laws of the United States of America that the  
21 foregoing is true and correct.

22 Executed on May 13, 2016 at Seattle, Washington.

23  
24 /s/ Steve W. Berman  
25 STEVE W. BERMAN  
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